



THE CITY OF NEW YORK  
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March 12, 2025

**BY ECF**

Honorable Joseph A. Marutollo  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Ricco D. Slade v. City of New York, et al.,  
24-CV-6711 (NCM) (JAM)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and write on behalf of the City as an interested party in the above-referenced matter.<sup>1</sup> The City writes to respectfully request a thirty-day extension of time, from March 14, 2025 to April 14, 2025, to complete its response to the Court's *Valentin* Order dated December 10, 2024 (ECF No. 11). This is the third request for an extension of the *Valentin* deadline. The undersigned attempted to obtain Plaintiff's position on this request, but was informed that the next available legal call with Plaintiff at Auburn Correctional Facility would not be until March 26, 2025.

By way of background, Plaintiff brings claims under 42 U.S.C. § 1983 arising from, *inter alia*, his December 28, 2022 arrest by detectives from the 110th Precinct in Queens. By Order dated December 10, 2024, this Court dismissed several claims but directed the Corporation Counsel to identify two John Doe Detectives pursuant to *Valentin v. Dinkins*, 121 F.3d 72 (2d Cir. 1997). (ECF No. 11). The Court granted the City's first request for an extension until February 14, 2025 (ECF No. 13), and its second request for an extension until March 14, 2025 (ECF Order dated February 13, 2025).

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<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Jack McLaughlin, who is presently awaiting admission to the Eastern District of New York and is handling this matter under my supervision. Mr. McLaughlin may be reached directly at (212) 356-2670 or by email at [jmclaugh@law.nyc.gov](mailto:jmclaugh@law.nyc.gov).

In the City's second extension request, this office identified Detective Steven Gassick as the primary detective who handled Plaintiff's arrest, and reported that despite diligent investigation, this office had been unable to identify the second John Doe detective, whose involvement with Plaintiff's arrest appears to have been minimal. This office also informed the Court that we had scheduled a call with Plaintiff for February 19, 2025 to obtain additional information, such as identifying physical characteristics, that might assist in identifying the second detective.

Unfortunately, on the date of the scheduled call, this office was unable to reach Plaintiff and was repeatedly routed to the facility operator. The operator informed us that Auburn Correctional Facility was on lockdown due to the ongoing correctional officer strike, which was affecting the ability to arrange legal calls. After multiple requests over the following week, Assistant Corporation Counsel Jack McLaughlin was finally able to secure a legal call with Plaintiff on March 4, 2025.

During this call, Plaintiff was cordial and cooperative, but unfortunately had little recollection of the John Doe detectives beyond identifying them as Caucasian males. This limited description has provided minimal assistance in narrowing down the pool to over a dozen detectives who could potentially be the second John Doe. This office has had insufficient time since that March 4th call to conduct further investigation to identify the specific detective from this sizeable group.

In our continued effort to fulfill our *Valentin* obligations, on March 7, 2025, this office attempted to schedule another call with Mr. Slade for this week to discuss our extension request and in an effort to obtain additional identifying information. We were informed that the next available legal call is not until March 26, 2025, which we scheduled.

Accordingly, the City respectfully requests a thirty-day extension, until April 14, 2025, to complete its investigation and attempt to identify the second John Doe detective.

The undersigned thanks the Court for its time and consideration of this request.

Respectfully Submitted,

*Joseph Zangrilli /s/*

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